

EPA Jacket 35900-3

Vol.2

DECISION PKG. NO. 72495
SUBMISSION BAR CODE # 927354

SUBM. DUE 12/28/12
REVIEWER M. Terry

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTS

FILE SYMBOL/REG NO. 35900-3 PM 33 ACTION CODE 332

DESCRIPTOR Notification FQPA NFQPA

[] CHILD RESISTANT PACKAGING; [] REQUIRED [] NOT REQUIRED
REGISTRATION TYPE: [] CONDITIONAL [] UNCONDITIONAL [] RESTRICTED USE

DATE ON APPLICATION 11/27/12 EPA RECEIVE DATE 11/30/12 PM RECEIVE DATE 11/30/12

METHOD OF SUPPORT FORMULATORS EXEMPTION
[] CITE-ALL [] SELECTIVE [] SUBMITTED [] NOT SUBMITTED
[] NOT SUBMITTED [] N/A [] N/A

REVIEW(S) REQUESTED	DATA PACK #	DATE SENT	DUE DATE	DATE RETURNED
CHEMISTRY				
EFFICACY				
ACUTE TOX.				
RASSB TOX.				
ENVIRON. FATE				
FISH/WILDLIFE				
OTHER:				

STATUS _____

RESPONSE CODE 1155

DEC 26 2012
RESPONSE DATE _____

SCIENCE GROUP	DIVISION	BRANCH	SECTION	CSF Y/N	LABEL Y/N
CHEMISTRY	AD	EASSB	CTT		
EFFICACY	AD	EASSB	EET		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 26 2012



Office of Pesticide Programs

Lewis and Harrison
c/o Puronics Water Systems, Inc.
122 C Street, N.W., Suite 740
Washington, D. C. 20001

Attention: Wendy A. McCombie, Agent

Subject: General Ionics Model IQ0820B Bacteriostatic Water Conditioner
EPA Registration No. 35900-3
Notification Dated November 27, 2012

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c)(9).

Proposed Notification

Additional Brand Names:

- (1) Model Filtramax
- (2) Water Conditioner Model Filtramax
- (3) Puronics Water Conditioner Model Filtramax
- (4) Filtramax FM-78
- (5) Water Conditioner Model Filtramax-78
- (6) Puronics Water Conditioner Model Filtramax FM-78
- (7) Model FM-78
- (8) Model Filtramax FM-78

General Comments


Based on a review of the submitted material, the following comments apply.

Page 2
EPA Registration No. 35900-3

The Notification is in compliance with PR Notice 98-10 and is acceptable.
This information has been made a part of your file.

If you have any questions concerning this letter, please contact Martha Terry
at (703) 308-6217.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Swindell", is written over the printed name.

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510P)

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 505
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

direct 202.393.3903 ext. 11
wmccombie@lewisharrison.com

November 27, 2012

HAND DELIVERED

Document Processing Desk [NOTIFY]
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

ATTENTION: **Marshall Swindell**
 Product Manager, Team 33

SUBJECT: **Puronics Water Systems, Inc.**
 General Ionics Model IQ0820B Bacteriostatic Water Conditioner
 EPA Reg. No. 35900-3
 Application for Notification – Ten (10) Alternate Brand Names
 This Submission Is NOT Subject to PRIA Fees

Dear Mr. Swindell:

On behalf of Puronics Water Systems, Inc. ("Puronics"), I am submitting a Notification to register a series of Alternate Brand Names for General Ionics Model IQ0820B Bacteriostatic Water Conditioner (EPA Reg. No. 35900-3). The proposed ten (10) Alternate Brand Names are as follows:

- 1) Model CL
- 2) Water Conditioner Model CL
- 3) Puronics® Water Conditioner Model CL
- 4) CL
- 5) Water Conditioner Model Defender™ MV30-B
- 6) Model Defender™ MV30-B
- 7) Defender™ MV30-B
- 8) Puronics® Model Defender™ MV30-B
- 9) Puronics® Water Conditioner Model Defender™ MV30-B
- 10) MV30-B

Per my previous e-mail discussion with you on December 4, 2008 (*copy attached*), no labels are needed for an Alternate Brand Name Notification that proposes multiple brand names.

Please find enclosed an Application for Pesticide Notification (Form 8570-1).

If you have any questions or need additional information, please contact me by telephone at 202-393-3903 x 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you in advance for your assistance with this submission.

Sincerely,



Wendy A. McCombie
Agent for,
Puronics Water Systems, Inc.

Enclosures

cc: John Gulliford, Puronics Water Systems, Inc.

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: EIGHT (8) ALTERNATE BRAND NAMES – SEE COVER LETTER****Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: November 27, 2012**THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES****Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
*Certification must be submitted					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 505, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature _____	3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date November 27, 2012	

Wendy McCombie

From: Swindell.Marshall@epamail.epa.gov
Sent: Thursday, December 04, 2008 9:17 PM
To: Wendy McCombie
Cc: Fuller.Demson@epamail.epa.gov
Subject: Re: Procedural Question for Alternate Brand Name Notifications

Wendy,

Please do not send me 100 ABN labels. However, for the time we will spend in going over all of the names, please send ten notifications with ten names each. You do not have to actually place the names on the amendment form, sending a cover letter with each of the ten amendment forms will be sufficient.

Marshall

"Wendy McCombie"
<wmccombie@lewis
harrison.com>

12/04/2008 12:36
PM

To
Demson Fuller/DC/USEPA/US@EPA
cc
Marshall Swindell/DC/USEPA/US@EPA
Subject
Procedural Question for Alternate
Brand Name Notifications

Demson -

We have a client who wants over 50 alternate brand names (ABNs) to be registered for their product (it may be closer to 100). I am aware that the Notification process for ABNs involves submitting a label for each name. In light of the vast amount of paperwork that would be generated doing a label for each name, is it possible to accomplish this simply by submitting a list of the desired names without an individual label for each?

The client is hoping to do this as soon as possible so that the names can be registered with states as well.

Thank you in advance for your help.

Best regards,

Wendy A. McCombie
Lewis & Harrison, LLC
122 C Street NW, Suite 740

Washington, DC 20001

202-393-3903x11 (phone)

202-393-3906 (fax)

wmccombie@lewisharrison.com (e-mail)

This e-mail message contains confidential or privileged information intended solely for the addressee. Please do not read, copy, or disseminate it unless you are the recipient specified for this message.

If you have received it in error, please call us at (202) 393-3903 and ask to speak with the message sender. Also, we would appreciate it if you could forward the message back to us and delete it from your system.

Thank you for your cooperation.

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**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number **General Ionics**
Model IQ0820B Bacteriostatic Water Conditioner

2. EPA Product Manager
Marshall Swindell

3. Proposed Classification

4. Company/Product (Name)
35900-3

PM#
33

☒ None ☐ Restricted

5. Name and Address of Applicant (Include ZIP Code)
Puronics Water Systems, Inc.
5775 Las Positas Road
Livermore, CA 94551

PLEASE SEND ALL CORRESPONDENCE TO
"CONTACT POINT" LISTED BELOW

☐ Check if this is a new address

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name: _____

Section – II

☐ Amendment – Explain below.

☐ Resubmission in response to Agency letter dated _____

☒ Notification – Explain below.

☐ Final printed labels in response to Agency letter dated _____

☐ "Me Too" Application

☐ Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

APPLICATION FOR NOTIFICATION: TEN (10) ALTERNATE BRAND NAMES – SEE COVER LETTER**Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: Wendy A. McCombie

Date: November 27, 2012

THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES

Section – III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging

☐ Yes*

☐ No

Unit Packaging

☐ Yes

☐ No

Water Soluble Packaging

☐ Yes

☐ No

2. Type of Container

☐ Metal

☐ Plastic

☐ Glass

☐ Paper

☐ Other (Specify)

***Certification must be submitted**

If "Yes"
Unit Packaging wgt.

No. per
container

If "Yes"
Package wgt.

No. per
container

3. Location of Net Contents Information

☐ Label

☐ Container

4. Size(s) Retail Container

5. Location of Label Direction

☐ On Label

☐ On labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph

☐ Paper glued

☐ Stenciled

☐ Other _____

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

Name **Wendy A. McCombie, Lewis & Harrison**
122 C Street, NW, Suite 505, Washington DC 20001
wmccombie@lewisharrison.com

Title
Agent for Puronics Water Systems, Inc.

Telephone No. (Include Area Code)
202-933-3903 x11

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application
Received
(Stamped)

2. Signature

3. Title

Agent for Puronics Water Systems, Inc.

4. Typed Name

Wendy A. McCombie, Lewis & Harrison, LLC

5. Date

November 27, 2012

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: TEN (10) ALTERNATE BRAND NAMES – SEE COVER LETTER****Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: Wendy A. McCombieDate: November 27, 2012**THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES****Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)			
Name Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 505, Washington DC 20001 wmccombie@lewisharrison.com		Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <u>Wendy A. McCombie</u>		3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC		5. Date November 27, 2012	

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 505
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

direct 202.393.3903 ext. 11
wmccombie@lewisharrison.com

November 27, 2012

HAND DELIVERED

Document Processing Desk [NOTIFY]
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

ATTENTION: **Marshall Swindell**
Product Manager, Team 33

SUBJECT: **Purionics Water Systems, Inc.**
General Ionics Model IQ0820B Bacteriostatic Water Conditioner
EPA Reg. No. 35900-3
Application for Notification – Ten (10) Alternate Brand Names
This Submission Is NOT Subject to PRIA Fees

Dear Mr. Swindell:

On behalf of Purionics Water Systems, Inc. ("Purionics"), I am submitting a Notification to register a series of Alternate Brand Names for General Ionics Model IQ0820B Bacteriostatic Water Conditioner (EPA Reg. No. 35900-3). The proposed ten (10) Alternate Brand Names are as follows:

- 1) Model Hydronex®
- 2) Water Conditioner Model Hydronex®
- 3) Purionics Water Conditioner Model Hydronex®
- 4) Ionics Water Conditioner Model Hydronex®
- 5) General Ionics Water Conditioner Model T Hydronex®
- 6) Purionics - Ionics - General Ionics - Water Conditioner Model Hydronex®
- 7) Clarius™
- 8) Purionics Clarius™
- 9) Model Defender™
- 10) Water Conditioner Model Defender™

Per my previous e-mail discussion with you on December 4, 2008 (*copy attached*), no labels are needed for an Alternate Brand Name Notification that proposes multiple brand names.

Please find enclosed an Application for Pesticide Notification (Form 8570-1).

If you have any questions or need additional information, please contact me by telephone at 202-393-3903 x 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you in advance for your assistance with this submission.

Sincerely,



Wendy A. McCombie
Agent for,
Puronics Water Systems, Inc.

Enclosures

cc: John Gulliford, Puronics Water Systems, Inc.

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: TEN (10) ALTERNATE BRAND NAMES – SEE COVER LETTER****Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that if it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: November 27, 2012

THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
*Certification must be submitted					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name: Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 505, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Data Application Received (Stamped)
2. Signature 	3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date November 27, 2012	

Wendy McCombie

From: Swindell.Marshall@epamail.epa.gov
Sent: Thursday, December 04, 2008 9:17 PM
To: Wendy McCombie
Cc: Fuller.Demson@epamail.epa.gov
Subject: Re: Procedural Question for Alternate Brand Name Notifications

Wendy,

Please do not send me 100 ABN labels. However, for the time we will spend in going over all of the names, please send ten notifications with ten names each. You do not have to actually place the names on the amendment form, sending a cover letter with each of the ten amendment forms will be sufficient.

Marshall

"Wendy McCombie"
<wmccombie@lewis
harrison.com>

12/04/2008 12:36
PM

To
Demson Fuller/DC/USEPA/US@EPA
cc
Marshall Swindell/DC/USEPA/US@EPA
Subject
Procedural Question for Alternate
Brand Name Notifications

Demson -

We have a client who wants over 50 alternate brand names (ABNs) to be registered for their product (it may be closer to 100). I am aware that the Notification process for ABNs involves submitting a label for each name. In light of the vast amount of paperwork that would be generated doing a label for each name, is it possible to accomplish this simply by submitting a list of the desired names without an individual label for each?

The client is hoping to do this as soon as possible so that the names can be registered with states as well.

Thank you in advance for your help.

Best regards,

Wendy A. McCombie
Lewis & Harrison, LLC
122 C Street NW, Suite 740

Washington, DC 20001
202-393-3903x11 (phone)
202-393-3906 (fax)
wmccombie@lewisharrison.com (e-mail)

This e-mail message contains confidential or privileged information intended solely for the addressee. Please do not read, copy, or disseminate it unless you are the recipient specified for this message.

If you have received it in error, please call us at (202) 393-3903 and ask to speak with the message sender. Also, we would appreciate it if you could forward the message back to us and delete it from your system.

Thank you for your cooperation.

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LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 505
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telephone 202.393.3903
fax 202.393.3906

direct 202.393.3903 ext. 11
wmccombie@lewisharrison.com

November 27, 2012

HAND DELIVERED

Document Processing Desk [NOTIFY]
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

ATTENTION: **Marshall Swindell**
 Product Manager, Team 33

SUBJECT: **Purronics Water Systems, Inc.**
 General Ionics Model IQ0820B Bacteriostatic Water Conditioner
 EPA Reg. No. 35900-3
 Application for Notification – Eight (8) Alternate Brand Names
 This Submission Is NOT Subject to PRIA Fees

Dear Mr. Swindell:

On behalf of Purronics Water Systems, Inc. ("Purronics"), I am submitting a Notification to register a series of Alternate Brand Names for General Ionics Model IQ0820B Bacteriostatic Water Conditioner (EPA Reg. No. 35900-3). The proposed eight (8) Alternate Brand Names are as follows:

- 1) Model Filtramax
- 2) Water Conditioner Model Filtramax
- 3) Purronics® Water Conditioner Model Filtramax
- 4) Filtramax FM-78
- 5) Water Conditioner Model Filtramax FM-78
- 6) Purronics® Water Conditioner Model Filtramax FM-78
- 7) Model FM-78
- 8) Model Filtramax FM-78

Per my previous e-mail discussion with you on December 4, 2008 (*copy attached*), no labels are needed for an Alternate Brand Name Notification that proposes multiple brand names.

Please find enclosed an Application for Pesticide Notification (Form 8570-1).

If you have any questions or need additional information, please contact me by telephone at 202-393-3903 x 11 or by e-mail at wmccombie@lewisharrison.com.

Wendy McCombie

From: Swindell.Marshall@epamail.epa.gov
Sent: Thursday, December 04, 2008 9:17 PM
To: Wendy McCombie
Cc: Fuller.Demson@epamail.epa.gov
Subject: Re: Procedural Question for Alternate Brand Name Notifications

Wendy,

Please do not send me 100 ABN labels. However, for the time we will spend in going over all of the names, please send ten notifications with ten names each. You do not have to actually place the names on the amendment form, sending a cover letter with each of the ten amendment forms will be sufficient.

Marshall

"Wendy McCombie"
<wmccombie@lewis
harrison.com>

12/04/2008 12:36
PM

To
Demson Fuller/DC/USEPA/US@EPA
cc
Marshall Swindell/DC/USEPA/US@EPA
Subject
Procedural Question for Alternate
Brand Name Notifications

Demson -

We have a client who wants over 50 alternate brand names (ABNs) to be registered for their product (it may be closer to 100). I am aware that the Notification process for ABNs involves submitting a label for each name. In light of the vast amount of paperwork that would be generated doing a label for each name, is it possible to accomplish this simply by submitting a list of the desired names without an individual label for each?

The client is hoping to do this as soon as possible so that the names can be registered with states as well.

Thank you in advance for your help.

Best regards,

Wendy A. McCombie
Lewis & Harrison, LLC
122 C Street NW, Suite 740

**EPA**

United States

Environmental Protection Agency

Washington, DC 20460

☐ Registration☐ Amendment☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I1. Company/Product Number **General Ionics**
Model IQ0820B Bacteriostatic Water Conditioner2. EPA Product Manager
Marshall Swindell3. Proposed Classification
☒ None ☐ Restricted4. Company/Product (Name)
35900-3PM#
335. Name and Address of Applicant (Include ZIP Code)
Puronics Water Systems, Inc.
5775 Las Positas Road
Livermore, CA 94551**PLEASE SEND ALL CORRESPONDENCE TO**
"CONTACT POINT" LISTED BELOW☐ Check if this is a new address6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name: _____

Section – II☐ Amendment – Explain below.☐ Resubmission in response to Agency letter dated _____☒ Notification – Explain below.☐ Final printed labels in response to Agency letter dated _____☐ "Me Too" Application☐ Other – Explain below**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: EIGHT (8) ALTERNATE BRAND NAMES – SEE COVER LETTER****Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: **November 27, 2012****THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES****Section – III**

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging

☐ Yes*☐ No

Unit Packaging

☐ Yes☐ No

Water Soluble Packaging

☐ Yes☐ No

2. Type of Container

☐ Metal☐ Plastic☐ Glass☐ Paper☐ Other (Specify) _____***Certification must
be submitted**If "Yes"
Unit Packaging wgt.No. per
containerIf "Yes"
Package wgt.No. per
container

3. Location of Net Contents Information

☐ Label☐ Container

4. Size(s) Retail Container

5. Location of Label Directions

☐ On Label☐ On labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph☐ Paper glued☐ Stenciled☐ Other _____**Section – IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

Name: **Wendy A. McCombie, Lewis & Harrison**
122 C Street, NW, Suite 505, Washington DC 20001
wmccombie@lewisharrison.comTitle
Agent for Puronics Water Systems, Inc.Telephone No. (Include Area Code)
202-393-3903 x11**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

Agent for Puronics Water Systems, Inc.

4. Typed Name

Wendy A. McCombie, Lewis & Harrison, LLC

5. Date

November 27, 20126. Date Application
Received
(Stamped)

Washington, DC 20001

202-393-3903x11 (phone)

202-393-3906 (fax)

wmccombie@lewisharrison.com (e-mail)

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If you have received it in error, please call us at (202) 393-3903 and ask to speak with the message sender. Also, we would appreciate it if you could forward the message back to us and delete it from your system.

Thank you for your cooperation.

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LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 505
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

direct 202.393.3903 ext. 11
wmccombie@lewisharrison.com

November 27, 2012

HAND DELIVERED

Document Processing Desk [NOTIFY]
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

ATTENTION: Marshall Swindell
Product Manager, Team 33

SUBJECT: *Puronics Water Systems, Inc.
General Ionics Model IQ0820B Bacteriostatic Water Conditioner
EPA Reg. No. 35900-3
Application for Notification – Ten (10) Alternate Brand Names
This Submission Is NOT Subject to PRIA Fees*

Dear Mr. Swindell:

On behalf of Puronics Water Systems, Inc. ("Puronics"), I am submitting a Notification to register a series of Alternate Brand Names for General Ionics Model IQ0820B Bacteriostatic Water Conditioner (EPA Reg. No. 35900-3). The proposed ten (10) Alternate Brand Names are as follows:

- 1) Model Defender™ CL
- 2) Water Conditioner Model Defender™ CL
- 3) Puronics® Water Conditioner Model Defender™ CL
- 4) Defender™ CL
- 5) Defender™ CL30B
- 6) Defender™ CL45B
- 7) Model Defender™ CL30B
- 8) Model Defender™ CL45B
- 9) Water Conditioner Model Defender™ CL30B
- 10) Water Conditioner Model Defender™ CL45B

Per my previous e-mail discussion with you on December 4, 2008 (*copy attached*), no labels are needed for an Alternate Brand Name Notification that proposes multiple brand names.

Please find enclosed an Application for Pesticide Notification (Form 8570-1).

If you have any questions or need additional information, please contact me by telephone at 202-393-3903 x 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you in advance for your assistance with this submission.

Sincerely,



Wendy A. McCombie
Agent for,
Puronics Water Systems, Inc.

Enclosures

cc: John Gulliford, Puronics Water Systems, Inc.

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: TEN (10) ALTERNATE BRAND NAMES – SEE COVER LETTER****Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: November 27, 2012

THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
*Certification must be submitted					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 505, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-293-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature _____	3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date November 27, 2012	

Wendy McCombie

From: Swindell.Marshall@epamail.epa.gov
Sent: Thursday, December 04, 2008 9:17 PM
To: Wendy McCombie
Cc: Fuller.Demson@epamail.epa.gov
Subject: Re: Procedural Question for Alternate Brand Name Notifications

Wendy,

Please do not send me 100 ABN labels. However, for the time we will spend in going over all of the names, please send ten notifications with ten names each. You do not have to actually place the names on the amendment form, sending a cover letter with each of the ten amendment forms will be sufficient.

Marshall

"Wendy McCombie"
<wmccombie@lewis
harrison.com>

12/04/2008 12:36
PM

To
Demson Fuller/DC/USEPA/US@EPA
cc
Marshall Swindell/DC/USEPA/US@EPA
Subject
Procedural Question for Alternate
Brand Name Notifications

Demson -

We have a client who wants over 50 alternate brand names (ABNs) to be registered for their product (it may be closer to 100). I am aware that the Notification process for ABNs involves submitting a label for each name. In light of the vast amount of paperwork that would be generated doing a label for each name, is it possible to accomplish this simply by submitting a list of the desired names without an individual label for each?

The client is hoping to do this as soon as possible so that the names can be registered with states as well.

Thank you in advance for your help.

Best regards,

Wendy A. McCombie
Lewis & Harrison, LLC
122 C Street NW, Suite 740

wmccombe@lewisharrison.com (e-mail)

This e-mail message contains confidential or privileged information intended solely for the addressee. Please do not read, copy, or disseminate it unless you are the recipient specified for this message.

If you have received it in error, please call us at (202) 393-3903 and ask to speak with the message sender. Also, we would appreciate it if you could forward the message back to us and delete it from your system.

Thank you for your cooperation.

[illegible]

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

- ☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: TEN (10) ALTERNATE BRAND NAMES – SEE COVER LETTER****Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: November 27, 2012

THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
*Certification must be submitted					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).			
Name Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 505, Washington DC 20001 wmccombie@lewisharrison.com		Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202 393 3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC		5. Date November 27, 2012	

DECISION PKG. NO. 468653SUBM. DUE DATE 8/18/2012SUBMISSION BAR CODE # 920545REVIEWER N. TERRYCODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTSFILE SYMBOL/REG NO. 35900-3 PM 33 ACTION CODE 333DESCRIPTOR NOTIFICATION FQPA NFQPA

[] CHILD RESISTANT PACKAGING: [] REQUIRED [] NOT REQUIRED
REGISTRATION TYPE: [] CONDITIONAL [] UNCONDITIONAL [] RESTRICTED USE

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

7/18/20127/19/20128/16/2012

METHOD OF SUPPORT

FORMULATORS EXEMPTION

[] CITE-ALL [] SELECTIVE
[] NOT SUBMITTED [] N/A

[] SUBMITTED [] NOT SUBMITTED
[] N/A

REVIEW(S) REQUESTED

DATA
PACK #DATE
SENTDUE
DATEDATE
RETURNED

CHEMISTRY [] [] [] []

EFFICACY [] [] [] []

ACUTE TOX. [] [] [] []

RASSB TOX. [] [] [] []

ENVIRON. FATE [] [] [] []

FISH/WILDLIFE [] [] [] []

OTHER: [] [] [] []

STATUS _____

RESPONSE CODE 1155RESPONSE DATE AUG 16 2012SCIENCE
GROUP

DIVISION

BRANCH

SECTION

CSF
Y/NLABEL
Y/NCHEMISTRY AD EASSB CTTEFFICACY AD EASSB EET

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 16 2012



United States
Environmental Protection
Agency

Office of Pesticide Programs

Lewis and Harrison
c/o Puronics Water Systems, Inc.
122 C Street, N.W., Suite 740
Washington, D. C. 20001

Attention: Wendy A. McCombie, Agent

Subject: Bacteriostatic Water Conditioner with HYgene

EPA Registration No. 35900-3

Notification Dated July 18, 2012

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c)(9).

Proposed Notification

Additional Brand Names:

- 1) Model Terminator® IQ
- 2) Water Conditioner Model Terminator® IQ
- 3) Puronics Water Conditioner Model Terminator® IQ
- 4) Ionics Water Conditioner Model Terminator® IQ
- 5) General Ionics Water Conditioner Model Terminator® IQ
- 6) Puronics – Ionics – General Ionics – Water Conditioner Model Terminator® IQ
- 7) Puronics Water Conditioner
- 8) Ionics Water Conditioner
- 9) General Ionics Water Conditioner
- 10) Puronics – Ionics – General Ionics – Water Conditioner

General Comments

Based on a review of the submitted material, the following comments apply.

Page 2
EPA Registration No. 35900-3

The Notification is in compliance with PR Notice 98-10 and is acceptable.
This information has been made a part of your file.

If you have any questions concerning this letter, please contact Martha Terry
at (703) 308-6217.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell", written in a cursive style.

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510P)

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

direct 202.393.3903 ext. 11
wmccombie@lewisharrison.com

July 18, 2012

HAND DELIVERED

Document Processing Desk [NOTIFY]
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

ATTENTION: **Marshall Swindell**
 Product Manager, Team 33

SUBJECT: **Puronic Water Systems, Inc.**
 General Ionics Model IQ0820B Bacteriostatic Water Conditioner
 EPA Reg. No. 35900-3
 Application for Notification – Ten (10) Alternate Brand Names
 This Submission Is NOT Subject to PRIA Fees

Dear Mr. Swindell:

On behalf of Puronic Water Systems, Inc. ("Puronic"), I am submitting a Notification to register a series of Alternate Brand Names for General Ionics Model IQ0820B Bacteriostatic Water Conditioner (EPA Reg. No. 35900-3). The proposed ten (10) Alternate Brand Names are as follows:

- 1) Model Terminator® IQ
- 2) Water Conditioner Model Terminator® IQ
- 3) Puronic Water Conditioner Model Terminator® IQ
- 4) Ionics Water Conditioner Model Terminator® IQ
- 5) General Ionics Water Conditioner Model Terminator® IQ
- 6) Puronic - Ionics - General Ionics - Water Conditioner Model Terminator® IQ
- 7) Puronic Water Conditioner
- 8) Ionics Water Conditioner
- 9) General Ionics Water Conditioner
- 10) Puronic - Ionics - General Ionics - Water Conditioner

Per my previous e-mail discussion with you on December 4, 2008 (copy attached), no labels are needed for an Alternate Brand Name Notification that proposes multiple brand names.

Please find enclosed an Application for Pesticide Notification (Form 8570-1).

If you have any questions or need additional information, please contact me by telephone at 202-393-3903 x 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you in advance for your assistance with this submission.

Sincerely,

A handwritten signature in black ink, appearing to read "Wendy A. McCombie", written over a horizontal line.

Wendy A. McCombie
Agent for,
Puronics Water Systems, Inc.

Enclosures

cc: John Gulliford, Puronics Water Systems, Inc.

Wendy McCombie

From: Swindell.Marshall@epamail.epa.gov
Sent: Thursday, December 04, 2008 9:17 PM
To: Wendy McCombie
Cc: Fuller.Demson@epamail.epa.gov
Subject: Re: Procedural Question for Alternate Brand Name Notifications

Wendy,

Please do not send me 100 ABN labels. However, for the time we will spend in going over all of the names, please send ten notifications with ten names each. You do not have to actually place the names on the amendment form, sending a cover letter with each of the ten amendment forms will be sufficient.

Marshall

"Wendy McCombie"
<wmccombie@lewis
harrison.com>

12/04/2008 12:36
PM

To
Demson Fuller/DC/USEPA/US@EPA
cc
Marshall Swindell/DC/USEPA/US@EPA
Subject
Procedural Question for Alternate
Brand Name Notifications

Demson -

We have a client who wants over 50 alternate brand names (ABNs) to be registered for their product (it may be closer to 100). I am aware that the Notification process for ABNs involves submitting a label for each name. In light of the vast amount of paperwork that would be generated doing a label for each name, is it possible to accomplish this simply by submitting a list of the desired names without an individual label for each?

The client is hoping to do this as soon as possible so that the names can be registered with states as well.

Thank you in advance for your help.

Best regards,

Wendy A. McCombie
Lewis & Harrison, LLC
122 C Street NW, Suite 740

Thank you for your cooperation.

$$\begin{array}{ccccccc}
 & 1 & 2 & 3 & 4 & 5 & 6 \\
 1 & & & & & & \\
 2 & 1 & & & & & \\
 3 & 1 & 1 & & & & \\
 4 & 1 & 3 & 1 & & & \\
 5 & 1 & 6 & 6 & 1 & & \\
 6 & 1 & 10 & 20 & 15 & 1 & \\
 7 & 1 & 15 & 45 & 63 & 21 & 1
 \end{array}$$


EPA

 United States
 Environmental Protection Agency
 Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner		2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3		PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____	

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

APPLICATION FOR NOTIFICATION: TEN (10) ALTERNATE BRAND NAMES – SEE COVER LETTER
Notification of Alternate Brand Name in Accordance With PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

 Signature: _____ Date: July 19, 2012
THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES
Section – III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input type="checkbox"/> Plastic	
*Certification must be submitted				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify)	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 740, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3603 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature _____	3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date July 19, 2012	

LEWIS & HARRISON

Consultants In Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

RECEIPT OF APPLICATION

SUBMISSION DATE: July 19, 2012

SUBMITTER: Wendy A. McCombie,
Agent for Puronics Water Systems, Inc.

SUBMITTED FOR: Puronics Water Systems, Inc.
Bacteriostatic Water Conditioner With HYgene (EPA Reg. No. 35900-3)
Application for Notification
This Submission Is NOT Subject to PRIA Fees

SUBMITTED TO: Marshall Swindell
Product Manager, Team 33
Antimicrobials Division
Antimicrobials Division (Mail Code 7504P)
Office of Pesticide Programs
Document Processing Desk [NOTIFY]
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

NOTE TO COURIER AND DOCUMENT PROCESSING DESK:

Please PIN-PUNCH a copy of the COVER LETTER inside this envelope and return to our office as a confirmation of receipt of submission. Thank you

Material Sent for Data Extraction

Reg # 35900-3

Description: _____

☒ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☒ Other: Amendment

☒ Decision #: 457344

☐ Other Action/Comments: _____

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: K Leavy

Phone: _____ Division: AD

Date: 1/10/12

Created February 3, 2011

DECISION PKG. NO. 457344
SUBMISSION BAR CODE # 906043

SUBM. DUE DATE 1/25/11
REVIEWER KL

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDME

FILE SYMBOL/REG NO. 35900-3 PM 33 ACTION CODE 302 PRIA

DESCRIPTOR Amendment FQPA NFQPA

☐ CHILD RESISTANT PACKAGING: ☐ REQUIRED ☐ NOT REQUIRED
REGISTRATION TYPE: ☐ CONDITIONAL ☐ UNCONDITIONAL ☐ RESTRICTED US

DATE ON APPLICATION EPA RECEIVE DATE PM RECEIVE DATE
10/27/11 10/27/11 10/27/11

METHOD OF SUPPORT FORMULATORS EXEMPTION
☐ CITE-ALL ☐ SELECTIVE ☐ SUBMITTED ☐ NOT SUBMITTED
☐ NOT SUBMITTED ☐ N/A ☐ N/A

REVIEW(S) REQUESTED	DATA PACK #	DATE SENT	DUE DATE	DATE RETURNED
CHEMISTRY				
EFFICACY				
ACUTE TOX.				
RASSE TOX.				
ENVIRON. FATE				
FISH/WILDLIFE				
OTHER:				

STATUS _____

RESPONSE CODE 1155 RESPONSE DATE 1/10/12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Wendy McCombie
Agent for,
Puronic Water Systems, Inc.
5775 Las Positas Road
Livermore, CA 94551

JAN 10 2012

Mail to: Attn: Wendy McCombie
Lewis and Harrison
122 C Street, N.W., Suite 740
Washington, D.C. 20001

Subject: Bacteriostatic Water Conditioner with HYgene
EPA Registration Number 35900-3
Your Amendment Dated October 27th, 2011
EPA Received Date October 27th, 2011

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, (FIFRA), as amended, to change the product name, revise the product labeling, and Homeowner's manual, is acceptable.

The registration file should reflect the following revision:

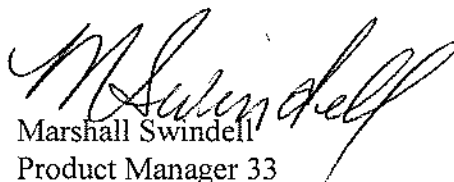
Old Product Name: General Ionics Model 1Q0820B Bacteriostatic Water Conditioner

New Product Name: Bacteriostatic Water Conditioner with HYgene

A stamped labeling is enclosed.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell", written in a cursive style.

Marshall Swindell

Product Manager 33

Regulatory Management Branch I

Antimicrobial Division(7510P)

IONICS® PURONICS® GENERAL IONICS®
BACTERIOSTATIC WATER CONDITIONER
WITH HYGENE®

This product is designed to inhibit the growth of
Bacteria in the ion exchange softener medium for
Municipally treated water to prolong the life of the filter

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA REGISTRATION NO. 35900-3

EPA ESTABLISHMENT NO. 35900-CA-001

ACTIVE INGREDIENT: Silver as metallic.....0.07%
INERT INGREDIENTS:.....99.93%
TOTAL:.....100.00%

STORAGE OF HYGENE® MEDIA-Store in closed container which excludes moisture and chemical fumes.

DISPOSAL OF SPENT MEDIA-----When contents are exhausted, wrap in newspaper and discard in the trash.

DIRECTIONS FOR USE-----See Homeowners Manual.

Net Contents: One (1) Bacteriostatic Water Conditioner with HYgene®

PURONICS®

Pure Water Solutions

MANUFACTURED BY:

PURONICS WATER SYSTEMS, INC.

5775 LAS POSITAS RD., LIVERMORE CA 94551

800.339.8780

www.puronics.com

ACCEPTED
with COMMENTS
EPA Letter Dated:

JAN 10 2012

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 35900-3



IT IS A VIOLATION OF FEDERAL LAW to use this product in a manner inconsistent with its labeling. Only use EPA Registered HYgene® silver impregnated carbon replacement media in this unit. Use of any media material other than HYgene® silver carbon manufactured by Puronics Water Systems, Inc. is a violation of the product's labeling instructions, causes improper operation of the unit, and voids the manufacturer's warranty. For your protection, do not accept a replacement media unless it is factory-sealed with the label reading "HYgene" manufactured by Puronics Water Systems, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 1, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CHRISTINA M. SWICK
LEWIS & HARRISON, LLC
PURONICS WATER SYSTEMS, INC.
122 C STREET, NW, SUITE 740
WASHINGTON, DC 20001-

PRODUCT NAME: GENERAL IONICS MODEL IQ0820B BACTERIOSTATIC WATER
CONDITIONER

COMPANY NAME: PURONICS WATER SYSTEMS, INC.

OPP IDENTIFICATION NUMBER:

EPA FILE SYMBOL: 35900-3

EPA RECEIPT DATE: 10/27/11

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 33, at (703) 308-6341.

Sincerely,

P. K. Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

direct 202.393.3903 ext. 11
wmccombie@lewisharrison.com

October 27, 2011

HAND DELIVERED

Document Processing Desk [AMEND]
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

ATTENTION: Marshall Swindell
Product Manager, Team 33

SUBJECT: *Puronic Water Systems, Inc.*
Bacteriostatic Water Conditioner With HYgene
EPA Reg. No. 35900-3
Application for Minor Label Amendment
This Submission Is NOT Subject to PRIA Fees

Dear Mr. Swindell:

On behalf of Puronic Water Systems, Inc. ("Puronic"), I am submitting a minor amendment to update the product label and revise the primary brand name for **Bacteriostatic Water Conditioner With HYgene (EPA Reg. No. 35900-3)**.

Please find enclosed the following documents:

- 1) Application for Label Amendment (EPA Form 8570-1);
- 2) Five (5) copies of the updated product label; and,
- 3) Five (5) copies of the Homeowner's Manual referenced on the label.

We would also like to note that the IQ and EE model designations listed in the Homeowner's Manual are covered by the alternate brand names that have been registered for this product.

If you have any questions or need additional information, please contact me by telephone at 202-393-3903 x 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you in advance for your assistance with this submission.

Sincerely,



Wendy A. McCombie
Agent for,
Puronic Water Systems, Inc.

Enclosures

cc: John Gulliford, Puronic Water Systems, Inc.

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number Bacteriostatic Water Conditioner With HYgene	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input checked="" type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR MINOR LABEL AMENDMENT****See Cover Letter For Details****THIS SUBMISSION IS NOT SUBJECT TO PRA FEES****Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
*Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
					<input type="checkbox"/> Glass
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name: Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 740, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date October 27, 2011	

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number Bacteriostatic Water Conditioner With HYgene	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronic Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input checked="" type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR MINOR LABEL AMENDMENT****See Cover Letter For Details****THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES****Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name: Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 740, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronic Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent for Puronic Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date October 27, 2011	

Fee for Service

{906043Ã~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☒ AD
- ☐ BPPD
- ☐ RD

Risk Mgr. 33

Receipt No.

S- 906043

EPA File Symbol/Reg. No.

35900-3

Pin-Punch Date:

10/27/2011



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Team 3

Date: 10/28/11

Remarks:

HOMEOWNER'S MANUAL

BACTERIOSTATIC WATER CONDITIONER WITH HYGENE Model IQ and Model EE

PURONICS®

The Next Generation of Ionics Solutions

Manufactured by:
Purionics Water Systems, Inc.
5775 Las Positas Road
Livermore, CA 94551
(800) 339-8780
www.purionics.com

IMPORTANT

This booklet contains your Owner Limited Warranty Card. Make sure this Warranty Card is filled out by your Dealer and returned to Puronics Water Systems, Inc. within two weeks of installation to assure proper warranty registration.

Questions about your warranty registration may be answered by writing to:

*Warranty Registration Dept.
c/o Puronics Water Systems, Inc.
5775 Las Positas Road
Livermore, CA 94551*

Your Puronics Dealer is ...

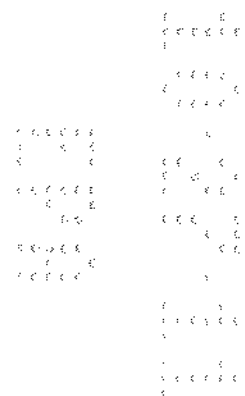
Congratulations

Puronics welcomes you to a new, carefree way of life with conditioned water. You can take pride and satisfaction knowing that you own the very best.

We are proud that you have selected the Puronics deluxe quality Water Conditioner for your home. Your sound judgment is supported by the wide acceptance received for these units throughout the world. More and more quality conscious homeowners are purchasing Puronics Water Conditioning equipment because of its superior performance and its premium quality workmanship.

The following pages of this booklet will introduce you to your new Puronics Water Conditioner by explaining operation, care and maintenance. In addition, the booklet provides recommendations for getting the very best performance from your unit as well as answers to commonly asked questions. At Puronics, we not only care for your water...we care for your family.

Puronics Water Systems, Inc.



PURONICS®

The Next Generation of Ionics Solutions

General Information

Your Puronics Water Conditioner is completely automatic. It will provide an abundance of conditioned water with just an occasional addition of salt to the brine tank when the salt reaches the "add salt" level. Your unit was thoroughly tested at the factory before shipping, and again at the time of installation.

The automatic timer is set to "regenerate" your water conditioner at night while you are sleeping. From experience, this is the best time because your water demand is lowest then and regeneration will not interfere with baths, washing clothes, etc. However, unconditioned water is available from all faucets during the regeneration cycle. With the Puronics Water Conditioner you are never without water.

It is a good idea to wipe the unit occasionally and then apply a good coat of wax. This procedure will keep your water conditioner looking bright and clean for a lifetime.

In case some problem should arise, you can manually by-pass the unit by throwing one lever (see illustration on page 6). Then call your authorized Puronics dealer. He has been trained in all phases of maintenance and repair work and will have the unit back in operation quickly. If there is not an Puronics dealer in your vicinity, then contact another reliable water conditioning firm. Failing that, please write directly to the factory: Puronics Water Systems, Inc., 5775 Las Positas Road, Livermore, CA 94551 Attention: Service Department.

Regeneration

Your Puronics Water Conditioning unit consists of a tank filled with a premeasured amount of a special mineral called S-759, formulated especially for Puronics equipment. On top of the tank is the control valve/timer, which works on the same principle as an electric clock. Alongside the unit is a storage tank which holds the salt and brine for the regeneration cycle.

Regeneration means recharging or recleaning the special S-759 mineral. It is important to know that the entire cycle is automatic and you will have nothing to do with it. The following steps are for your own enlightenment... and to demonstrate the thoroughness of the automatic cycle: 1. Backwashing, which reverses the action of the water, throws off the sediment (called turbidity) that has been filtered out of the water, and flushes it down the drain. 2. Salt, as brine, is injected into the unit to clean and revitalize the S-759 mineral. (The amount of salt used is controlled by a float valve, which operates the same as the float in the water tank of your toilet.) 3. Slow rinse. 4. Fast rinse. 5. Valve automatically returns to the service position to again supply you with good, conditioned water.

What Salt To Use

Salt is your water conditioner's fuel. Using the right fuel is as important here as it is to get the best performance from your car. It is strongly recommended to use only nugget or pellet type salt in your water conditioner. This type of salt is pure and free of undesirable insolubles. Nugget or pellet type water conditioner salt is available from your Puronics dealer.

NOTE: Common rock salt is NOT recommended because much of it contains insolubles. The continued use of common rock salt will necessitate more frequent cleaning of the brine tank, or

worse, it may cause a malfunction of the valving. However, specially processed water conditioner rock salt, as handled by your local dealer, may be used.

When To Add Salt

The brine tank has a capacity up to 250 lbs. of nugget or pellet salt. You can add salt whenever it is most convenient for you, but it is important to replenish the supply before the pellets reach the "add salt" level indicated by the label on the salt storage tank.

Bridging Or Caking

The salt platform in your brine tank has been engineered to eliminate salt bridging or caking. However, under certain atmospheric conditions these circumstances can occur and will prevent the salt from coming in contact with the water level. When your water seems to be hard, check the salt in the storage tank. If it appears to be bridging or caking, break it up with a short wooden stick. In doing so, be careful not to probe the full depth of the brine tank because you may damage the salt platform.

Bacteriostatic — An Puronics Exclusive

If your Puronics Water Conditioner is an Environmental Protection Agency (EPA) Registered Bacteriostatic model, you have two unique added features. First, this unit inhibits the growth of bacteria within the S-759 ion exchange filter media bed. Second, it reduces and in many cases completely eliminates organic tastes, odors and colors from the water.

Inside the Bacteriostatic model water conditioner a layer of HYgene® silver-impregnated activated carbon (EPA-Registered Bacteriostatic Water Filter Media) is placed on top of the S-759 mineral. The silver acts as the inhibiting agent while the activated carbon adsorbs objectionable tastes, odors and colors.



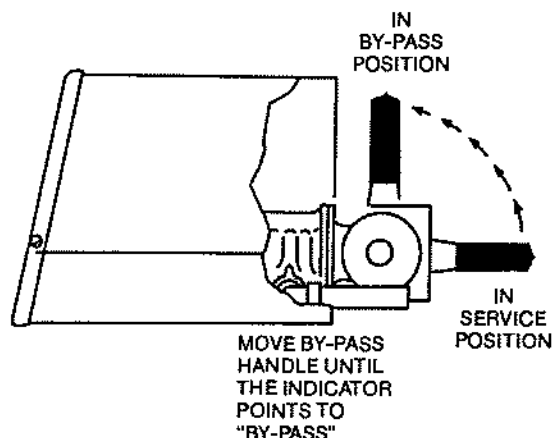
IT IS A VIOLATION OF FEDERAL LAW to use this product in a manner inconsistent with its labeling. Only use EPA Registered HYgene® silver-impregnated carbon replacement media in this unit. Use of any medium other than HYgene® silver carbon manufactured by Puronics Water Systems, Inc. is a violation of the proper operation of the unit, and voids the manufacturer's warranty. For your protection, do not accept a replacement media unless it is factory-sealed with both the tape and label reading "HYgene" manufactured by Puronics Water Systems, Inc.. The EPA has restricted the Bacteriostatic models for use only on treated municipally supplied tap water, which precludes its use on well water.

THE INSTALLATION OF ANY REPLACEMENT PARTS, FILTERS OR MEDIA NOT SOLD OR AUTHORIZED BY PURONICS WILL VOID THE WARRANTY.

By-Pass Instruction

In case any problem should occur that cannot be immediately resolved, it is recommended to manually by-pass the unit as shown and call your authorized Puronics dealer.

MODELS IQ and EE



LIFE EXPECTANCY OF HYGENE® BACTERIOSTATIC MEDIA

Model Nos. (IQ)	Tank Diameter	HYgene Content	Bacteriostatic Gallons	Media Life Family of 4
0820-B	8"	2lb.	75,000	12 months
1030-B	10"	3lb.	112,500	18 months
1240-B	11"	4lb.	150,000	24 months

NOTE: CHLORINE LEVELS IN EXCESS OF 1 PPM MAY REDUCE LIFETIME OF MEDIA.

It is suggested that a water meter reading be noted at time of installation. Add to that reading the expected gallon life of the Bacteriostatic medium from the above chart. Record what the water meter reading will be when replacement should be made.

Water meter reading at time of installation _____ Gallons

Expected life of media (from above chart) + _____ Gallons

Water meter reading, media replacement _____ Gallons

Model IQ Special Features

Directions For Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For use on cold water only.

Meter-Controlled Regeneration

The Model IQ control minimizes salt usage and water waste by accurately monitoring the conditioned water and then initiating a regeneration only when the S-759 mineral is near exhaustion. Six-cycle down-flow brining assures accurate salting while the adjustable time regeneration program uses the minimum amount of water required per cycle.

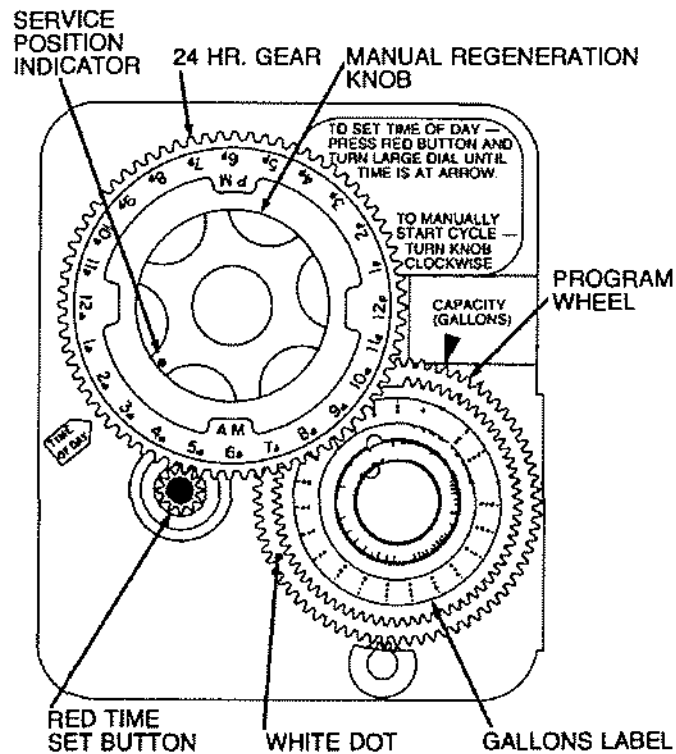
In service a mechanical meter accurately monitors water usage. This feature eliminates the costly wasted capacity due to premature regenerations.

Vacation Periods

There is no need to be concerned about disconnections or adjustments on your Model IQ Water Conditioner before leaving your home for long periods of time. When no water is being used, the "brain" will simply remain idle for that period of time and be ready to monitor water usage when you return home.

High Usage Demand/Weekend Guests

The Model IQ Water Conditioner's "brain" will automatically recognize the increase in water usage and regenerate before running out of conditioner water. Unpredictable water demand is never a problem with the Puronics Model IQ.



How To Set The Time Of Day

If you should have a power failure or want to adjust for Daylight Saving Time, follow these Instructions.

Press and hold in the red button to disengage the drive gear.

Turn the large gear until the actual time of day is opposite the time of day pointer.

Release the red button to engage the drive gear.

How To Manually Regenerate Your Water Conditioner At Any Time

Turn the manual regeneration knob clockwise.

This slight movement of the manual regeneration knob engages the program wheel and starts the regeneration program.

The black center knob will make one revolution in the following three hours and stop in the position shown in the drawing.

Even though it takes three hours for this center knob to complete one revolution, the regeneration cycle of your unit might be set for only one-half of this time.

In any event, conditioned water may be drawn after rinse water stops flowing from the water conditioner drain line.

Model EE Special Features

Directions For Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

For use on cold water only.

Energy Efficient Control

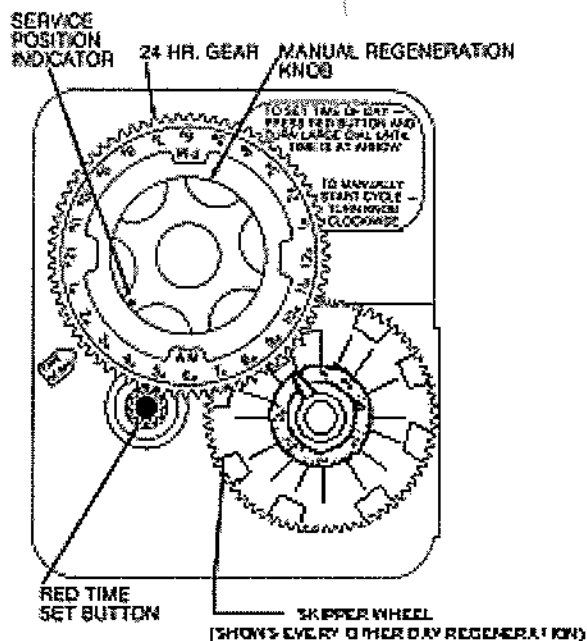
This fully automatic six-cycle valve with 12-day timer schedules regenerations at preset intervals. The day and the hour for regeneration, as well as the salt dosage, have been set at the time of installation by the installer. These settings have been carefully calculated according to your family needs and to get the maximum recovery of the resin while minimizing water usage. **Do Not Change These Settings Without First Consulting Your Dealer.**

Vacation Periods

Why allow your water conditioner to continue regenerating while you are on vacation? It would be a waste of salt to recharge an already charged mineral bed. With your Energy Efficient Purotics Model EE Water Conditioner, vacation time has been taken into account. Simply move the by-pass valve lever (see illustration on page 5 of this manual) until the indicator points to "by-pass". By doing so, the unit will continue to go through the preset regeneration cycles, but actually it will not regenerate. When you return home, move the by-pass valve lever back to the "service" position and you will again have conditioned water as before.

High Usage Demand/Weekend Guests

As mentioned previously, your Purotics Model EE unit is set for your own needs. Higher than normal usage such as weekend guests will naturally place a greater demand for conditioned water on the unit. The method for manually regenerating the unit is covered on page 10. This "extra" regeneration will not interfere with the regular programmed cycle.



How To Set The Time Of Day

If you should have a power failure or want to adjust for Daylight Saving Time, follow these instructions.

Press and hold in the red button to disengage the drive gear.

Turn the large gear until the actual time of day is opposite the time of day pointer.

Release the red button to engage the drive gear.

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Even though it takes three hours for this center knob to complete one revolution, the regeneration cycle of your unit might be set for only one-half of this time.

In any event, conditioned water may be drawn after rinse water stops flowing from the water conditioner drain line.

INSTALLATION INSTRUCTIONS FOR THE Model IQ and EE

All water conditioners should be installed in accordance with applicable state and local plumbing and electrical codes.

These instructions supplement and do not supersede local codes.

Please read & understand the installation instruction completely before installing the water conditioned system.

VALVE POSITIONS

1. Service
2. Backwash
3. Brine and Slow Rinse
4. Fast Rinse
5. Brine Tank Refill

The entire water conditioner has been factory tested to ensure proper performance and the customer's satisfaction.

UNPACKING

This automatic water conditioner has been shipped complete in two cartons. These containers have been carefully designed to assure the customer of satisfactory arrival at the destination.

One carton contains the water conditioner tank which is preloaded with permanent high capacity ion exchange resin. The control valve is mounted on top of this tank. The carton also contains the homeowners manual, water conditioner tank leveling legs, meter, bypass, transformer (if 24V system) and warranty card. Care should be executed in unpacking to prevent accidental loss of these components.

The second carton contains the salt storage tank and its components. These consist of a salt grid system, a three-foot section of polyethylene brine tubing and a disassembled slide-a-salt brine valve assembly.

Remove control face plate and shroud. Place the mineral tank on the three plastic leveling legs and level.

For Model IQ, attach the meter to the main valve and then the bypass to the meter. When installed properly, while standing in front of the system, the attachment point for the meter cable on the meter will be on the right and the bypass handle, when in the bypass position, will be pointing straight up. Make sure you have moved the bypass lever so that the indicator points to bypass position. Plug the meter cable into the meter. This is done by just pressing the cable end into the small receiving hole in the rounded cover in meter case.

INSTALLATION

Select a location that is convenient for drain facilities, electrical outlet, and for servicing and adding salt. The stainless steel tank **MUST** be placed on the plastic leveling legs provided. The legs can be adjusted to level the system effectively.

Turn main water supply off. Drain plumbing system by opening a cold water faucet as low as possible

in the house and one as high as possible.

The connection point for the plumbing to the water conditioner should be in the main water line after any installed check valves and/or pressure regulators. The installation should also be cut in after any backflow prevention devices or sprinkler/irrigation systems. The cut-in must be before any Tee's in the main plumbing line that feeds any fixtures in the house.

Cut the main supply line and remove approximately 6 inches of existing plumbing. If existing plumbing is galvanized pipe, you will have to cut the pipe and thread or remove a section of pipe and replace with copper tubing or any code approved plumbing product.

Run the plumbing from the main shut off side or "street side" of the cut that was made in the plumbing to the inlet opening in the bypass valve marked "In" or with the "in arrow". This connection must be into the bottom of the two openings in the bypass valve.

Use caution in soldering so that excessive heat is not applied in the vicinity of the valve for any extended time. Use wet towels or rags to conduct heat from the valve. Also avoid excess pipe dope and solder that might enter the valve.

Run the outlet plumbing from the opening in the bypass valve marked "outlet" or with the "out arrow" to the return or "house" side of the cut that was made in the main plumbing. The outlet must come from the top of the bypass valve

Puronic recommends not reducing the size of the existing plumbing. If main service line is 3/4" then the system should be installed in 3/4" copper tubing or pipe.

When the connections are fully completed verify that the bypass handle is in the bypass position. Turn main water supply on. Check for leaks. Shut off the lower faucet that was turned on earlier and then turn off the upper faucet. Re-check to make sure there are no leaks in the plumbing.

RUN & CONNECT THE DRAIN LINE

The Drain Adapter is the black fitting located on the right side of the main valve with the barb adapter in it. If vertical drain is necessary, limit to a rise of 8 feet under average water pressure. Best plumbing practice and most plumbing codes require a 1-1/2" (or two times the size of the drain line) air gap between end (outlet) of the drain line and receiver (floor drain, utility sink, etc.).

Use caution when screwing the barb adapter into the drain housing. The lock screw should be loosened and the black drain adapter should be pulled out to attach the barb fitting while in hand. The male threads on the barb fitting should have Teflon tape applied and only be hand tightened snugly. Over tightening can stress and crack the black drain adapter.

The end (outlet) of the drain line must be secured in position to avoid movement from the set position.

Never use any tubing smaller than 1/2" inside diameter for drain line.

PLACEMENT OF THE SALT STORAGE TANK

Make sure that salt storage tank is level and on a smooth surface. If a rough or uneven floor is the only support available, set the salt storage tank on a piece of Masonite or plywood and level.

SETTING UP THE BRINE VALVE ASSEMBLY

Loosen the nut on the underside of the brine valve and insert the gray salt draw tube to the bottom of the brine valve. Be sure the gray tube inserts fully into the brine valve and then tighten the nut. (Hard, hand tight if using the black plastic valve and wrench tight if using the brass valve).

The float stick is attached to the arm on the Brine Valve by removing the top grommet from the float stick. Put the float stick end through the valve arm and put the grommet back on.

Attention must be given to proper adjustment of the rubber grommets on the float rod. There must be ½ inch of free stick extending beyond the bottom grommet. There must be ½ inch of free stick extending beyond the top most grommet above the valve arm. There must be ½ inch of free stick or "play" between the two grommets on either side of the Brine Valve arm.

SETTING THE SALT USE FOR BRINE TANKS WITH A GRID PLATE SYSTEM (Brine tanks not equipped with a Grid Plate System do not need any salt setting adjustment)

Adjust the Select-A-Salt slider to the proper settings below;

For all 12" systems set the salt settings to 12 lbs.

Tighten the white nylon nut, hand tight at the lbs. of salt selected. Then wrench tighten 1/4 turn only. Mount brine valve assembly into the brine well making sure air check at the bottom of the draw tube is turned to the extreme right or left to be sure there is sufficient clearance for the float to move freely up & down.

Connect the 3/8 brine line to the safety brine valve on the left side of the main valve of the system (opposite the drain line). Then attach to the brine valve making sure that the brass inserts (stiffeners) provided are used at each end of the 3/8 brine line. Make sure nuts are tight at each end of the brine line. Make sure the brine line is fully inserted into the valves before tightening.

ADD WATER TO THE SALT TANK

(For salt tanks with Grid Plate Systems only.)

Salt storage tank must be pre-filled with water on initial installation. Do not overfill. Water level must be to 1" over grid system. If you fail to do so the first regeneration will not be effective as the water will not go above the grid table.

If a salt tank without a grid plate system is used, do not fill with water.

ELECTRIC HOOK-UP

Plug electric cord into electrical outlet. Many receptacles in present installations may not have provisions for the 3-prong plugs. If not, a parallel ground adapter must be used. If used, make certain that the grounding tab on this adapter is firmly attached to the screw on the receptacle box. Do not plug into ungrounded temporary power supplies. Verify that the receptacle used is "hot" all of the time & is not operated by a wall switch.

24 volt systems should be wired from the "pig tail" wires on the back of the timer control assembly to

the transformer using proper 24 volt wire. Be sure to completely wire the connections before plugging in the transformer.

SETTING UP THE SYSTEM

To set the system for regeneration the water hardness will have to be tested by a water professional or call the local municipality. The hardness must be set in Grains Per Gallon (gpg).

Locate the Program Wheel on the lower right corner of the timer. (See Homeowners Manual for location). To adjust the settings, the back (largest) gear must be held in place while the dial with the two stick figure people on it (People Dial) is pulled slightly out and rotated. Use your pre-established Grains Per Gallon (gpg) as the reference point, pull and rotate the People Dial so that the number in YOUR family matches (is directly across from) your pre-established Grains Per Gallon.

To set time of day, push in the red button and rotate the time gear so that the white Time of Day arrow point to the correct time of day & release the red button.

SYSTEM START-UP

Open a utility sink, bath tub, or any faucet without an aerator. With the faucet running push the bypass lever forward until indicator points to service position to fill, expel air, and rinse out the system.

THIS IS A MUST.

LET THE WATER RUN FROM THE FAUCET FOR A FULL TEN (10) MINUTES

After ten minutes pull the bypass handle up to the bypassed position and shut off the running faucet.

Now turn the Regeneration Dial (the one with the finger grips) clockwise one click to the backwash position to expel air compressed in the unit through the drain. (If nothing happens check the electric hook up. If the electric is fine, then turn the regeneration dial clockwise one more click). When the air has stopped purging from the drain, open the bypass only 1/3rd of the way. When there is a steady flow of water at the exit point of the drain line, open the bypass handle completely.

Now add the salt to the Brine Tank.

The salt in the brine tank can be maintained at any level between almost empty to completely full as long as the brine tank does not run out of salt the system will perform properly.

Run all of the faucets in the house to clear all of the plumbing lines of air and water from the installation.

Fill out warranty card in the Homeowners Manual. Fill out information required on inside of face plate.

Replace control face plate, and shroud. The installation is now complete.

Double check the following items before leaving installation site:

(1) Check plumbing for possible leaks.

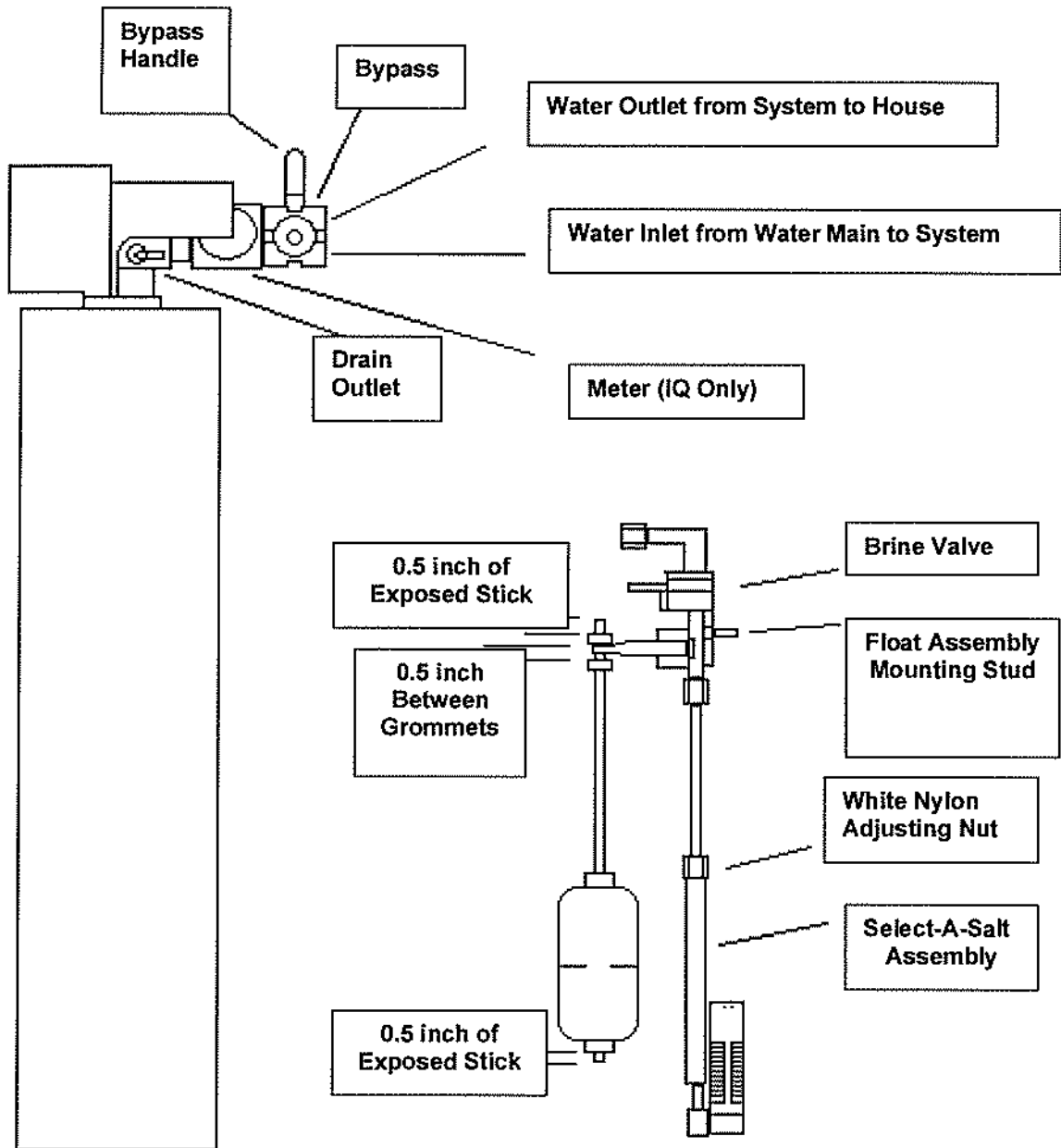
(2) Has warranty card been correctly and completely filled out?

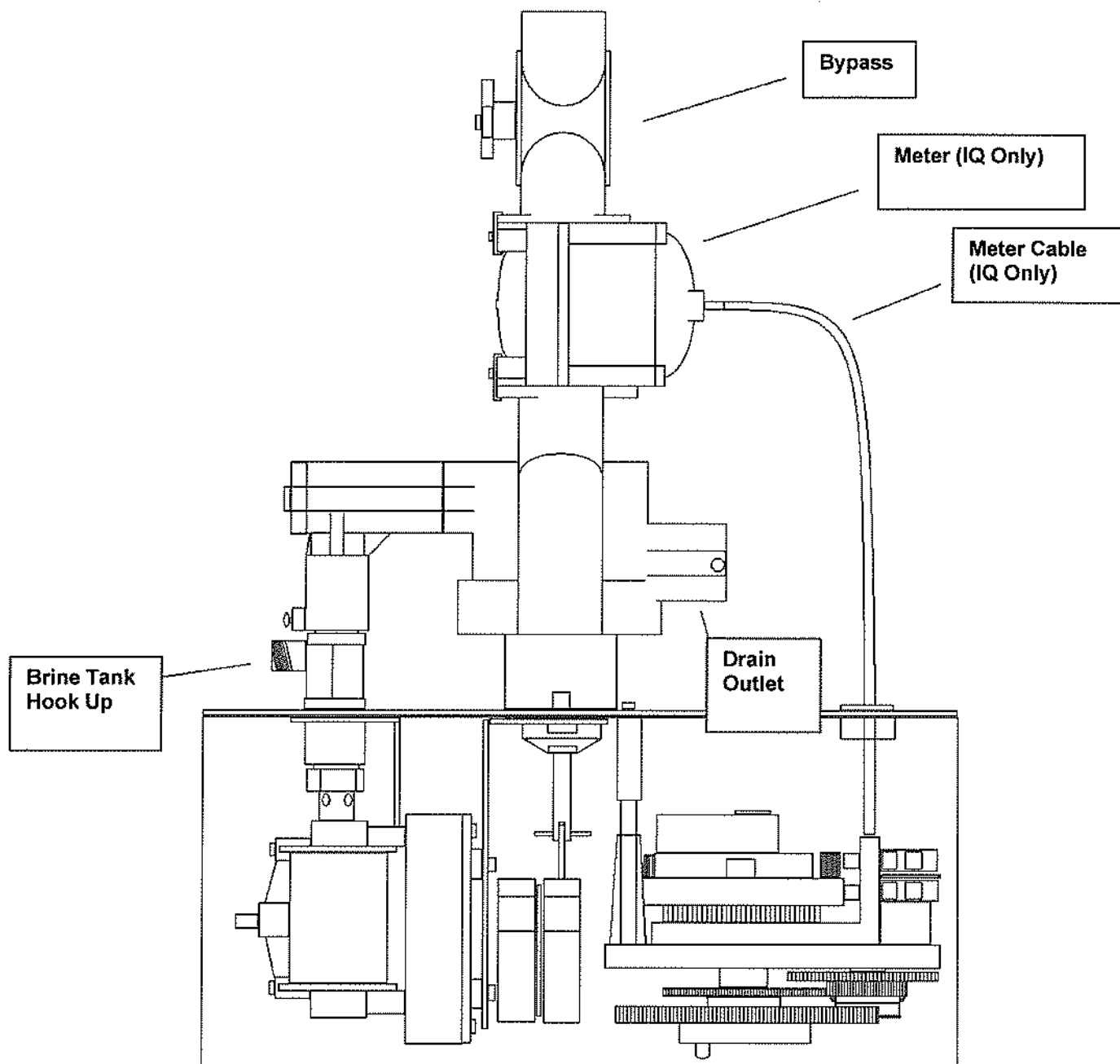
This warranty card **MUST** be returned to validate your Factory Warranty.

(3) Is control valve power cord plugged in?

- (4) Did you add water to the brine tank? (brine tank with grid plate only)
- (5) Is there salt in the storage tank?
- (6) Is Slide-A-Salt brine valve adjusted for amount of salt per regeneration?
- (7) Is bypass lever in service position?
- (8) Has air (caused by water being shut-off for installation) been released from all water lines in the house?
- (9) Have the proper regeneration settings been made?
- (10) Has correct time of day been set and proper regeneration time?

Side View of the System





**Top View of Main Valve & Control
Assembly**

Questions And Answers

What is water conditioning?

Water conditioning is that branch of engineering that determines the chemical characteristics of a tap water supply, as it enters your home, and treats these characteristics so as to provide water more suitable and economical for household use.

Why is it essential to improve water quality?

Beyond being an absolute necessity of life, water is an outstanding cleaning agent. The trouble is that nature does a lot of things with water long before you have a chance to use it in your laundry or at your kitchen sink. You get it, as it were, second hand. Therefore, improving your water quality by water conditioning is just as essential as any other home appliance.

Does the conditioned water have a "different" taste?

Taste is difficult to define as no two people have the same sense of taste. A water conditioner will remove certain minerals and turbidity from the water, giving you a cleaner, better tasting water.

Will conditioned water give a cleaner, brighter wash?

Yes. For best results, you should use the proper amount of laundering agent. Keep in mind a 60 to 80% soap saving can be achieved with conditioned water. Learn to use less laundering agent because none of the cleansing compound will be wasted as in hard water cleaning. The amount of laundering agent you use depends on: (1) its effectiveness, (2) the volume and temperature of water, (3) the size of the wash load, and (4) the type and amount of dirt and grime.

What effect will conditioned water have on plumbing?

Before the water was conditioned, the hard water caused a scale buildup in the hot water pipes and water heater. Scale acts as an insulating material. In the water heater, scale reduces heat transmission, wastes fuel and often causes heating coil and tube failure. The installation of a water conditioner not only prevents further scale formation but will gradually remove previously formed scale deposits. A recent study indicates that softened water offers a saving of 23% in energy cost in the operation of a hot water heater.

Are the minerals which a conditioner removes from hard water essential to health?

No. The quantity of minerals found in hard water are not essential to good health.

Is the sodium in softened water harmful to people on restrictive diets?

Much depends on the strictness of the diet itself. When the patient is on an extremely restrictive diet, he should drink neither hard nor softened water. Under these conditions he should have demineralized water, distilled water, or water known to be free of sodium for drinking and for the cooking of foods. Such patients are commonly hospitalized.

In establishing a salt-free diet for patients, physicians should not overlook the fact that even hard water may contain appreciable amounts of sodium. To determine the amount a complete analysis of the water is necessary.

How much sodium is added to softened water?

Each grain per gallon (GPG) hardness removed adds 7.875 milligrams (mg) of sodium to a liter of water, which is approximately one quart. The average daily sodium intake of an adult individual is 3,000 to 4,000 milligrams and the average fluid intake is 1.6 to 2.0 liters per day. A liter is slightly more than four 8-ounce glasses of water. Two liters per day or 8.4 eight-ounce glasses of water amounts to a total sodium intake from a source of softened 8 GPG water of 125.16 milligrams. This is

approximately 3% of the average daily sodium intake.

There is another way to answer this question, and that depends on the hardness of your raw water. The following table shows the additional amount of sodium consumed by drinking ONE quart of softened water.

Initial Water Hardness	Sodium Added By Softening
5 Grains/Gallon	37.5 Milligrams/Quart
10 Grains/Gallon	75.0 Milligrams/Quart
20 Grains/Gallon	300.0 Milligrams/Quart
40 Grains/Gallon	300.0 Milligrams/Quart

How does this sodium content of conditioned water compare to sodium found in common foods?

The data in the following table demonstrate the usual range of sodium in common foods.

Food	Amount	Milligrams of Sodium
Milk	2 Cups	226
Bread	2 Slices	322
Corn Flakes	1 Ounce	260
Tomato Juice	4 Ounces	504
Chili	1 Cup	1194
Tomato Soup	1 Cup	932
Beef Broth	1 Cup	1152
Frankfurter	1 Medium	610
Hamburger (Fast Food)	¼ Pound	1510
Catsup	1 Tablespoon	204
Canned Baked Beans	¾ Cup	1130
Canned Asparagus	½ Cup	560
Frozen Peas	½ Cup	295
Cottage Cheese	4 Ounces	457
Parmesan Cheese	1 Ounce	528
Pretzels	¼ Pound	1925

It is important to note that about 2/3 of the daily water intake of any individual is through food and only about 1/3 from water itself.

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

RECEIPT OF APPLICATION

SUBMISSION DATE: October 27, 2011

SUBMITTER: Wendy A. McCombie,
Agent for Puronics Water Systems, Inc.

SUBMITTED FOR: Puronics Water Systems, Inc.
Bacteriostatic Water Conditioner With HYgene (EPA Reg. No. 35900-3)
Application for Minor Label Amendment
This Submission Is NOT Subject to PRIA Fees

SUBMITTED TO: Marshall Swindell
Product Manager, Team 33
Antimicrobials Division
Antimicrobials Division (Mail Code 7504P)
Office of Pesticide Programs
Document Processing Desk [AMEND]
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

NOTE TO COURIER AND DOCUMENT PROCESSING DESK:

Please PIN-PUNCH a copy of the COVER LETTER inside this envelope and return to our office as a confirmation of receipt of submission. Thank you

IONICS® PURONICS® GENERAL IONICS®
BACTERIOSTATIC WATER CONDITIONER
WITH HYGENE®

**This product is designed to inhibit the growth of
Bacteria in the ion exchange softener medium for
Municipally treated water to prolong the life of the filter**

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA REGISTRATION NO. 35900-3

EPA ESTABLISHMENT NO. 35900-CA-001

ACTIVE INGREDIENT: Silver as metallic.....0.07%
INERT INGREDIENTS:.....99.93%
TOTAL:.....100.00%

STORAGE OF HYGENE® MEDIA—Store in closed container which excludes moisture and chemical fumes.

DISPOSAL OF SPENT MEDIA-----When contents are exhausted, wrap in newspaper and discard in the trash.

DIRECTIONS FOR USE-----See Homeowners Manual.

Net Contents: One (1) Bacteriostatic Water Conditioner with HYgene®

PURONICS®

Pure Water Solutions

MANUFACTURED BY:
PURONICS WATER SYSTEMS, INC.
5775 LAS POSITAS RD., LIVERMORE CA 94551
800.339.8780
www.puronics.com



IT IS A VIOLATION OF FEDERAL LAW to use this product in a manner inconsistent with its labeling. Only use EPA Registered HYgene® silver impregnated carbon replacement media in this unit. Use of any media material other than HYgene® silver carbon manufactured by Puronics Water Systems, Inc. is a violation of the product's labeling instructions, causes improper operation of the unit, and voids the manufacturer's warranty. For your protection, do not accept a replacement media unless it is factory-sealed with the label reading "HYgene" manufactured by Puronics Water Systems, Inc.

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Net Contents: One (1) Bacteriostatic Water Conditioner with HYgene®

PURONICS®
✓
Pure Water Solutions

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

MANUFACTURED BY:
PURONICS WATER SYSTEMS, INC.
5775 LAS POSITAS RD., LIVERMORE CA 94551
800.339.8780
www.puronics.com

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.**



IT IS A VIOLATION OF FEDERAL LAW to use this product in a manner inconsistent with its labeling. Only use EPA Registered HYgene® silver impregnated carbon replacement media in this unit. Use of any media material other than HYgene® silver carbon manufactured by Puronics Water Systems, Inc. is a violation of the product's labeling instructions, causes improper operation of the unit, and voids the manufacturer's warranty. For your protection, do not accept a replacement media unless it is factory-sealed with the label reading "HYgene" manufactured by Puronics Water Systems, Inc.

Material Sent for Data Extraction

Reg # 35900-3

Description: _____

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☒ Notification Dated 3/23/11

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: 445896

☐ Other Action/Comments: _____

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: Z Johnson

Phone: _____ Division: AD

Date: 3/23/11

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

MAR 23 2011

Puronic Water Systems, Inc.
5775 Las Positas Road
Livermore, CA
94551

Attention: Wendy A. McCombie

Subject: General Ionics Model IQ0820B Bacteriostatic Water Conditioner
Registration No: 35900-3
Notification Dated: February 14, 2011

This will acknowledge receipt of your notification for the following additional alternate brand names, submitted under the provisions of FIFRA Section 3(c) (9). Based on a review of the submitted material, the following comments apply

To Register A Series of Alternate Brand Names

- 1) Puronic Model CL-5645-BW
- 2) Puronic Model CLARIOUS 10
- 3) Puronic Model CLARIOUS 12
- 4) Puronic Model CLARIOUS CL 12
- 5) Puronic Model CLARIOUS CL 1260
- 6) Puronic Model CL-FM-78
- 7) Puronic Model DEFENDER-B
- 8) Puronic Model EE-0820B
- 9) Puronic Model EE-0820PB
- 10) Puronic Model EE-1030B

General Comments

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

If you have any questions concerning this letter, please feel free to contact Zebora Johnson at (703) 308-7080.

Sincerely

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell

Product Manager (33)

Regulatory Management Branch I

Antimicrobial's Division (7501P)

33

LEWIS & HARRISON

Consultants In Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

direct 202.393.3903 ext. 11
wmccombie@lewisharrison.com

February 14, 2011

HAND DELIVERED

Document Processing Desk [NOTIFY]
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

ATTENTION: **Marshall Swindell**
 Product Manager, Team 33

SUBJECT: **Puronics Water Systems, Inc.**
 General Ionics Model IQ0820B Bacteriostatic Water Conditioner
 EPA Reg. No. 35900-3
 Application for Notification - Alternate Brand Names (02)
 This Submission Is NOT Subject to PRIA Fees

Dear Mr. Swindell:

On behalf of Puronics Water Systems, Inc. ("Puronics"), I am submitting a Notification to register a series of Alternate Brand Names for General Ionics Model IQ0820B Bacteriostatic Water Conditioner (EPA Reg. No. 35900-3). The proposed Alternate Brand Names are as follows:

- 1) Puronics Model CL-5645-BW
- 2) Puronics Model CLARIUS 10
- 3) Puronics Model CLARIUS 12
- 4) Puronics Model CLARIUS CL12
- 5) Puronics Model CLARIUS CL1260
- 6) Puronics Model CL-FM-78
- 7) Puronics Model DEFENDER-B
- 8) Puronics Model EE-0820B
- 9) Puronics Model EE-0820PB
- 10) Puronics Model EE-1030B

Per my e-mail discussion with you on December 4, 2008 (copy attached), no labels are needed for this Alternate Brand Name Notification.

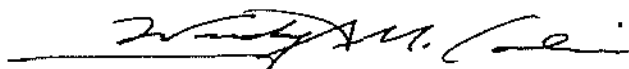
Please find enclosed an Application for Pesticide Notification (Form 8570-1).

In addition, please note that this Notification was originally submitted back in December 2008, but no approval letter was received. **Puronics requires an approval letter to fulfill state requirements.** We would appreciate if the Agency could assist with this effort.

If you have any questions or need additional information, please contact me by telephone at 202-393-3903 x 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you in advance for your assistance with this submission.

Sincerely,



Wendy A. McCombie
Agent for,
Puronics Water Systems, Inc.

Enclosures

cc: John Gulliford, Puronics Water Systems, Inc.

33

Wendy McCombie

From: Swindell.Marshall@epamail.epa.gov
Sent: Thursday, December 04, 2008 9:17 PM
To: Wendy McCombie
Cc: Fuller.Demson@epamail.epa.gov
Subject: Re: Procedural Question for Alternate Brand Name Notifications

Wendy,

Please do not send me 100 ABN labels. However, for the time we will spend in going over all of the names, please send ten notifications with ten names each. You do not have to actually place the names on the amendment form, sending a cover letter with each of the ten amendment forms will be sufficient.

Marshall

"Wendy McCombie"
<wmccombie@lewis
harrison.com>

12/04/2008 12:36
PM

To
Demson Fuller/DC/USEPA/US@EPA
cc
Marshall Swindell/DC/USEPA/US@EPA
Subject
Procedural Question for Alternate
Brand Name Notifications

Demson --

We have a client who wants over 50 alternate brand names (ABNs) to be registered for their product (it may be closer to 100). I am aware that the Notification process for ABNs involves submitting a label for each name. In light of the vast amount of paperwork that would be generated doing a label for each name, is it possible to accomplish this simply by submitting a list of the desired names without an individual label for each?

The client is hoping to do this as soon as possible so that the names can be registered with states as well.

Thank you in advance for your help.

Best regards,

Wendy A. McCombie
Lewis & Harrison, LLC
122 C Street NW, Suite 740

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

- ☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner 35900-3	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: ALTERNATE BRAND NAME****Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Signature: _____

Date: February 14, 2011

THIS SUBMISSION IS NOT SUBJECT TO PRA FEES**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
*Certification must be submitted					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 740, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronics Water Systems, Inc.	Telephone No. (include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date February 14, 2011	

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

- ☐ Registration
☐ Amendment
☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**APPLICATION FOR NOTIFICATION: ALTERNATE BRAND NAME****Notification of Alternate Brand Name in Accordance With PR Notice 98-10**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: February 14, 2011

THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Plastic
*Certification must be submitted					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name: Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 740, Washington DC 20001 wmccombie@lewisharrison.com	Title: Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature _____	3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date February 14, 2011	

Material Sent for Data Extraction

Reg # 35900-3

Description: _____

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☐ Notification Dated 3/8/11

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: 445882

☐ Other Action/Comments: _____

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: A Downs

Phone: _____ Division: AD

Date: 3/8/11

Created February 3, 2011

DECISION PKG. NO. 445882

SUBM. DUE DATE 3/26/11

SUBMISSION BAR CODE # 891306

REVIEWER AD

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMEND

FILE SYMBOL/REG NO. 35900-3 PM 33 ACTION CODE 332 PRIA

DESCRIPTOR Notification FQPA NFQPA

[] CHILD RESISTANT PACKAGING: [] REQUIRED [] NOT REQUIRED
REGISTRATION TYPE: [] CONDITIONAL [] UNCONDITIONAL [] RESTRICTED

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

2/22/11

2/24/11

2/24/11

METHOD OF SUPPORT

FORMULATORS EXEMPTION

[] CITE-ALL [] SELECTIVE
[] NOT SUBMITTED [] N/A

[] SUBMITTED [] NOT SUBMITTED
[] N/A

REVIEW(S) REQUESTED

DATA
PACK #

DATE
SENT

DUE
DATE

DATE
RETURNED

CHEMISTRY [] [] [] []

EFFICACY [] [] [] []

ACUTE TOX. [] [] [] []

RASSE TOX. [] [] [] []

ENVIRON. FATE [] [] [] []

FISH/WILDLIFE [] [] [] []

OTHER: [] [] [] []

STATUS _____

RESPONSE CODE 1155

RESPONSE DATE 3/8/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR - 8 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Puronics Water Systems, Inc.
5775 Las Positas Road
Livermore, CA 94551

Attention: Wendy McCombie
Agent for Puronics Water Systems, Inc.
Lewis & Harrison
122 C Street, NW Suite 740
Washington, DC 20001

Subject: Notification – Addition of alternate brand names
General Ionics Model IQ0820B Bacteriostatic Water Conditioner
EPA Reg. No. 35900-3
Application Dated February 22, 2011

This will acknowledge receipt of your notification for the aforementioned product label, submitted under the provisions of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 3© (9). Based on a review of the submitted material, the following apply:

- The Agency approves the following additional brand names:
 - Bacteriostatic Water Conditioner With Hygene
 - Puronics Bacteriostatic Water Conditioner with Hygene
 - Ionics Bacteriostatic Water Conditioner With Hygene
 - General Ionics Bacteriostatic Water Conditioner With Hygene
 - Puronics – Ionics – General Ionics – Bacteriostatic Water Conditioner With Hygene
 - Bacteriostatic Water Conditioner
 - Puronics Bacteriostatic Water Conditioner
 - Ionics Bacteriostatic Water Conditioner
 - General Ionics Bacteriostatic Conditioner
 - Puronics – Ionics – General Ionics – Bacteriostatic Water Conditioner

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

If you have any questions concerning this letter, please contact Abigail Downs at (703) 305-5259.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell". The signature is fluid and cursive, with the first name "M." and the last name "Swindell" clearly distinguishable.

Marshall Swindell
Product Manager (33)
Regulatory Management Branch I
Antimicrobials Division (7510P)

33

LEWIS & HARRISON

Consultants In Government Affairs

122 C Street, N.W., Suite 740
Washington, O.C. 20001

telephone 202.393.3903
fax 202.393.3906

direct 202.393.3903 ext. 11
wmccombie@lewisharrison.com

February 22, 2011

HAND DELIVERED

Document Processing Desk [NOTIFY]
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

ATTENTION: **Marshall Swindell**
Product Manager, Team 33

SUBJECT: ***Puronics Water Systems, Inc.***
General Ionics Model IQ0820B Bacteriostatic Water Conditioner
EPA Reg. No. 35900-3
Application for Notification – Ten (10) Alternate Brand Names
This Submission Is NOT Subject to PRIA Fees

Dear Mr. Swindell:

On behalf of Puronics Water Systems, Inc. ("Puronics"), I am submitting a Notification to register a series of Alternate Brand Names for General Ionics Model IQ0820B Bacteriostatic Water Conditioner (EPA Reg. No. 35900-3). The proposed ten (10) Alternate Brand Names are as follows:

- 1) Bacteriostatic Water Conditioner With Hygiene
- 2) Puronics Bacteriostatic Water Conditioner With Hygiene
- 3) Ionics Bacteriostatic Water Conditioner With Hygiene
- 4) General Ionics Bacteriostatic Water Conditioner With Hygiene
- 5) Puronics - Ionics - General Ionics - Bacteriostatic Water Conditioner With Hygiene
- 6) Bacteriostatic Water Conditioner
- 7) Puronics Bacteriostatic Water Conditioner
- 8) Ionics Bacteriostatic Water Conditioner
- 9) General Ionics Bacteriostatic Water Conditioner
- 10) Puronics - Ionics - General Ionics - Bacteriostatic Water Conditioner

Per my e-mail discussion with you on December 4, 2008, no labels are needed for an Alternate Brand Name Notification with multiple brand names.

Please find enclosed an Application for Pesticide Notification (Form 8570-1).

If you have any questions or need additional information, please contact me by telephone at 202-393-3903 x 11 or by e-mail at wmccombie@lewisharrison.com.

Thank you in advance for your assistance with this submission.

Sincerely,



Wendy A. McCombie
Agent for,
Puronics Water Systems, Inc.

Enclosures

cc: John Gulliford, Puronics Water Systems, Inc.


EPA

 United States
Environmental Protection Agency
 Washington, DC 20460

☐ Registration
☐ Amendment
☒ **Other NOTIFICATION**

OPP Identifier Number

Application for Pesticide – Section I

 1. Company/Product Number **General Ionics**
Model IQ0820B Bacteriostatic Water Conditioner

 2. EPA Product Manager
Marshall Swindell

 3. Proposed Classification
☒ None ☐ Restricted

 4. Company/Product (Name)
35900-3

 PM#
33

 5. Name and Address of Applicant (Include ZIP Code)
Puronics Water Systems, Inc.
5775 Las Positas Road
Livermore, CA 94551

 6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:
 EPA Reg. No. _____
 Product Name: _____

PLEASE SEND ALL CORRESPONDENCE TO
"CONTACT POINT" LISTED BELOW
☐ Check if this is a new address

Section – II
☐ Amendment – Explain below. ☐ Final printed labels in response to Agency letter dated _____
☐ Resubmission in response to Agency letter dated _____ ☐ "Me Too" Application
☒ Notification – Explain below. ☐ Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

APPLICATION FOR NOTIFICATION: TEN (10) ALTERNATE BRAND NAMES – SEE COVER LETTER
Notification of Alternate Brand Name in Accordance With PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____

Date: February 22, 2011
THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES
Section – III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging

☐ Yes*
☐ No

Unit Packaging

☐ Yes
☐ No

Water Soluble Packaging

☐ Yes
☐ No

2. Type of Container

☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ Other (Specify)

***Certification must be submitted**

If "Yes" Unit Packaging wgt. No. per container

If "Yes" Package wgt. No. per container

 3. Location of Net Contents Information
☐ Label ☐ Container

4. Size(s) Retail Container

5. Location of Label Directions

☐ On Label
☐ On labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph ☐ Other _____
☐ Paper glued
☐ Stenciled

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

 Name **Wendy A. McCombie, Lewis & Harrison**
122 C Street, NW, Suite 740, Washington DC 20001
wmccombie@lewisharrison.com

 Title
Agent for Puronics Water Systems, Inc.

 Telephone No. (Include Area Code)
202-393-3903 x11
Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete; acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

Agent for Puronics Water Systems, Inc.

4. Typed Name

5. Date

Wendy A. McCombie, Lewis & Harrison, LLC
February 22, 2011

 6. Date Application Received
 (Stamped)



EPA

United States

Environmental Protection Agency

Washington, DC 20460

☐ Registration☐ Amendment☒ Other NOTIFICATION

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

APPLICATION FOR NOTIFICATION: TEN (10) ALTERNATE BRAND NAMES – SEE COVER LETTER

Notification of Alternate Brand Name in Accordance With PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: _____ Date: **February 22, 2011**

THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES

Section – III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input type="checkbox"/> Plastic	
*Certification must be submitted				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify)	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 740, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature _____		
3. Title Agent for Puronics Water Systems, Inc.		
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC		5. Date February 22, 2011

MATERIAL TO BE ADDED TO JACKET

REG #

359DD-3

Description:

Amendment

check all that apply		Send to CSC
<input type="checkbox"/>	new stamped accepted label	
<input checked="" type="checkbox"/>	new CSF	
<input type="checkbox"/>	notification	

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's
Name:

D Fuller

Date:

8/11/07

Phone:

308-8062

Division:

AD

DECISION PKG. NO. 344571SUBM. DUE DATE 8-11-08SUBMISSION BAR CODE # 830628REVIEWER D. FullerCODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTSFILE SYMBOL/REG NO. 35406-3 PM 33 ACTION CODE 362DESCRIPTOR CSF Amendment **FQPA** **NFQPA**☐ CHILD RESISTANT PACKAGING: ☐ REQUIRED ☐ NOT REQUIREDREGISTRATION TYPE: ☐ CONDITIONAL ☐ UNCONDITIONAL ☐ RESTRICTED USE

DATE ON APPLICATION

EPA RECEIVE DATE

PM RECEIVE DATE

5, 6, 085, 13, 085, 13, 08

METHOD OF SUPPORT

FORMULATORS EXEMPTION

☐ CITE-ALL ☐ SELECTIVE
☐ NOT SUBMITTED ☐ N/A☐ SUBMITTED ☐ NOT SUBMITTED
☐ N/A

REVIEW(S) REQUESTED

DATA
PACK #DATE
SENTDUE
DATEDATE
RETURNEDCHEMISTRY ☐ ☐ ☐ ☐EFFICACY ☐ ☐ ☐ ☐ACUTE TOX. ☐ ☐ ☐ ☐RASSB TOX. ☐ ☐ ☐ ☐ENVIRON. FATE ☐ ☐ ☐ ☐FISH/WILDLIFE ☐ ☐ ☐ ☐OTHER: ☐ ☐ ☐ ☐

STATUS _____

RESPONSE CODE 1155RESPONSE DATE 8-11-08SCIENCE
GROUP

DIVISION

BRANCH

SECTION

CSF
Y/NLABEL
Y/NCHEMISTRY AD EASSB CTTEFFICACY AD EASSB EET

MATERIAL TO BE ADDED TO JACKET

REG # 35942-3

Description: CSF Amendment

check all that apply	
<input type="checkbox"/>	new stamped accepted label
<input type="checkbox"/>	new CSF
<input type="checkbox"/>	notification

Send to CSC

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's
Name: D. Fuller

Date: 8/11/08

Phone: 308-8062

Division: AD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Lewis & Harrison
Agent for Puronics Water Systems, Inc.
122 C Street, NW., Suite 740
Washington, DC 20001

AUG 11 2008

Attention: Wendy McCombie

Subject: Puronics Water Systems, Inc.
EPA Registration No. 35900-3
Amendment Application Date: May 6, 2008

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) as amended is acceptable

The alternate Confidential Statements of Formula (CSF) submitted with respect to registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, meets the requirements of PR 91-2 and 40 CFR 158.155 (Product Identity and Composition) and accurately reflects the Nominal Concentration for the active and inert ingredients.

If you have any question or comments concerning this letter, please contact me at (703) 308 6341 or Demson Fuller at (703) 308-8062.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell".

Marshall Swindell
Product Manager (33)
Regulatory Management Branch I
Antimicrobials Division (7510P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF PREVENTION,
PESTICIDES AND
TOXIC SUBSTANCES

August 8, 2008

DP Barcode: DP 353488

MRIDs: None

Subject: *General Ionics Model IQ0820B Bacteriostatic Water*

Registration No. EPA Reg. # 35900-3

Document Type: Product Chemistry Review

Ingredients (PC Codes): 069105, 069149

CAS Number: 7173-52-5, 68424-89-1

Submitter: Puronics Water Systems, Inc.

Commodities: Amended Product Registration

Reviewer: Nancy Whyte *Nancy Whyte August 8, 2008*
Microbiologist
Product Science Branch

Organization: Antimicrobials Division
7510P

Approver: Karen P. Hicks Approved Date *8/12/08*

Comment:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF PREVENTION,
PESTICIDES AND
TOXIC SUBSTANCES

To: PM / PM reviewer: Marshall Swindell/Demson Fuller
PM Team #33

From: Nancy G. Whyte
Microbiologist, Special Assistant
Product Science Branch
Antimicrobial Division (7510P)

Thru: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobial Division (7510P)

Thru: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobial Division (7510P)

Applicant: Puronics Water Systems, Inc.

Action code: 362

Due date: August 11, 2008

Product Formulation:

Active Ingredient(s)	% by wt/vol.
Silver.....	1.00%
Other ingredients.....	98.99%
Total.....	100.00%

Background:

The registrant has submitted nine (9) new alternate formulations for this water conditioner product. Each formulations (identified as 2008-01A thru 2008-01I and dated April 22, 2008) corresponds to a different size and type of water conditioner which vary with 3 separate suppliers of the ion exchanged material and the source of the under bed material. Included in the data package with the Confidential Statements of Formula were a cover letter and EPA Form 8570-34. A product label from Agency files was added by the Product Manager reviewer.

Findings:

1. All the ingredients have been approved for use in pesticide products.

2. The certified limits of all the ingredients are with those specified in 40 CFR, Part 158.175.

Conclusions:

1. The amended Confidential Statements of Formula, dated April 22, 2008, are Acceptable as submitted for review.

Fee for Service

{829163/~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☒ AD

☐ BPPD

☐ RD

Risk Mgr.

33

Receipt No.

S-

829163

EPA File Symbol/Reg. No.

35900-3

Pin-Punch Date:

5/13/2008



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ ____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Mail Team 3

Date: 5/16/08

Remarks:

ISB'S Front-end PRIA Completeness Screen

Draft 3; 10/25/07

EPA Receipt Date: MAY 14 2008		EPA Reg. Number: 35900-3		
	Check List Item	Yes	No	N/A
1	Has the PRIA Fee been Paid ; is a copy of the check or Pay.gov receipt included in the Submission Package?		X	
2	Is an Application Form (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	X		
3	Is a Confidential Statement of Formula (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	X		
4	Is a Formulator's Exemption Statement (EPA Form 8570-27) Included in the Submission Package?		X	
5	Is a Certification with Respect to Citation of Data (EPA Form 8570-34) Included in the Submission Package?		X	
6	Is a Data Matrix (EPA Form 8570-35) Included in the Submission Package?	X		
7	Is a Label Included in the Submission Package?		X	
8	Are Data Included in the Submission Package?		X	
9	Is the Submission an Amendment?	X		

FEE FOR SERVICE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 19, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CHRISTINA M. SWICK
LEWIS & HARRISON, LLC
PURONICS WATER SYSTEMS, INC.
122 C STREET, NW, SUITE 740
WASHINGTON, DC 20001-

PRODUCT NAME: GENERAL IONICS MODEL IQ0820B BACTERIOSTATIC WATER
CONDITIONER

COMPANY NAME: PURONICS WATER SYSTEMS, INC.

OPP IDENTIFICATION NUMBER:

EPA FILE SYMBOL: 35900-3

EPA RECEIPT DATE: 05/13/08

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 33, at (703) 308-6341.

Sincerely,
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number **General Ionics**
Model IQ0820B Bacteriostatic Water Conditioner

2. EPA Product Manager
Marshall Swindell

3. Proposed Classification

☒ None ☐ Restricted

4. Company/Product (Name)
35900-3

PM#
33

5. Name and Address of Applicant (Include ZIP Code)
Purionics Water Systems, Inc.
5775 Las Positas Road
Livermore, CA 94551

PLEASE SEND ALL CORRESPONDENCE TO
"CONTACT POINT" LISTED BELOW

☐ Check if this is a new address

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:

EPA Reg. No. **a) 35900- 9 & b) 35900- 19**

Product Name: **a) General Ionics Model IQ 1240B Bacteriostatic Water Conditioner & b) General Ionics Model IQ 1030B Bacteriostatic Water Conditioner**

Section – II

☒ Amendment – Explain below.

☐ Resubmission in response to Agency letter dated _____

☐ Notification – Explain below.

☐ Final printed labels in response to Agency letter dated _____

☒ "Me Too" Application

☐ Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Formula Amendment –Alternate Formulas - See Cover Letter For Details

This Submission Is Not Subject To PRIA Fees

Section – III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging

☐ Yes*
☐ No

Unit Packaging

☐ Yes
☐ No

Water Soluble Packaging

☐ Yes
☐ No

2. Type of Container

☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ Other (Specify)

***Certification must be submitted**

If "Yes" Unit Packaging wgt. No. per container

If "Yes" Package wgt. No. per container

3. Location of Net Contents Information
☐ Label ☐ Container

4. Size(s) Retail Container

5. Location of Label Directions
☐ On Label
☐ On labeling accompanying product

6. Manner in Which Label is Affixed to Product

☐ Lithograph
☐ Paper glued
☐ Stenciled

☐ Other _____

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

Name **Wendy A. McCombie, Lewis & Harrison**
122 C Street, NW, Suite 740, Washington DC 20001
wmccombie@lewisharrison.com

Title
Agent for Purionics Water Systems, Inc.

Telephone No. (Include Area Code)
202-393-3903 x11

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete, and I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

Agent for Purionics Water Systems, Inc.

4. Typed Name

Wendy A. McCombie, Lewis & Harrison, LLC

5. Date

May 6, 2008

6. Date Application Received
(Stamped)

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number General Ionics Model IQ0820B Bacteriostatic Water Conditioner	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) 35900-3	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Puronics Water Systems, Inc. 5775 Las Positas Road Livermore, CA 94551 <u>PLEASE SEND ALL CORRESPONDENCE TO</u> <u>"CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. a) 35900-9 & b) 35900-19 Product Name: a) General Ionics Model IQ 1240B Bacteriostatic Water Conditioner & b) General Ionics Model IQ 1030B Bacteriostatic Water Conditioner

Section – II

☒ Amendment – Explain below. ☐ Final printed labels in response to Agency letter dated _____
☐ Resubmission in response to Agency letter dated _____ ☒ "Me Too" Application
☐ Notification – Explain below. ☐ Other – Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Formula Amendment –Alternate Formulas - See Cover Letter For Details**This Submission Is Not Subject To PRIA Fees****Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
*Certification must be submitted				<input type="checkbox"/> Other (Specify)	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product		
6. Manner in Which Label Is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Wendy A. McCombie, Lewis & Harrison 122 C Street, NW, Suite 740, Washington DC 20001 wmccombie@lewisharrison.com	Title Agent for Puronics Water Systems, Inc.	Telephone No. (Include Area Code) 202-393-3903 x11
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamp)
2. Signature 	3. Title Agent for Puronics Water Systems, Inc.	
4. Typed Name Wendy A. McCombie, Lewis & Harrison, LLC	5. Date May 6, 2008	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

 401 M Street, S.W.
 WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address and Telephone Number Agent: 202-303-3903 x11 Puronics Water Systems, Inc. - 5775 Las Positas Road Livermore, CA 94551	EPA Registration Number/ File Symbol 35900-3
Active Ingredient(s) and/or representative test compound(s): Silver (EPA A.I.# 72501)	Date May 6, 2008
General use pattern(s) (list all those claimed for this product using 40 CFR Part 158) Aquatic Food Crop	Product Name General Ionics Model IQ0820B Bacteriostatic Water Conditioner

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

- ☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

- ☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).
- ☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

- ☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data Call-In Notice is supported by all data submitted or cited in the application for registration, the form for reregistration, or this Data Call-In response. In addition, if cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original submitter or that I have obtained the written permission of the original submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the written permission of the original data submitter to use this study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date May 6, 2008	Typed or Printed Name and Title Wendy A. McCombie, Lewis & Harrison, LLC - Agent for Puronics Water Systems, Inc.
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